

IN THE UNITED STATES DISTRICT COURT
IN AND FOR THE DISTRICT OF DELAWARE

LYNN SANSOUCIE,

Plaintiff,

v.

REPRODUCTIVE ASSOCIATES
OF DELAWARE, P.A.,

Defendant.

)
)
)
)
)
)
)
)
)
)

C.A. NO. 04-0861-JJF

JURY TRIAL DEMANDED

DEFENDANT'S PROPOSED VOIR DIRE

Defendant proposes the jury panel be provided with the following written voir dire questions:

1. The Defendant, Reproductive Associates of Delaware, P.A., is a medical practice which provides medical care to couples and individuals having difficulty becoming pregnant and having children. Reproductive Associates specializes *in-vitro* fertilization and artificial insemination procedures to help infertile couples and individuals achieve pregnancy. *In-vitro* fertilization involves the fertilization of an egg and the growth of an embryo outside of the body under laboratory conditions. Artificial insemination involves the injection of sperm into a female's uterus under laboratory conditions. Do you have any beliefs or feelings for or against these types of procedures which may prevent you from being completely fair and impartial in this case?

2. Are you, a relative, or a friend, presently involved in a lawsuit against your employer or another employer, or have you been involved in such a lawsuit or claim within the last 5 years? If so, explain the circumstances and the outcome.

3. Have you, a relative, or a friend ever been involved as a party, witness, or otherwise, in a situation involving the workplace, or in a case involving a claim for unpaid wages or overtime compensation? If so, explain the circumstances and the outcome.

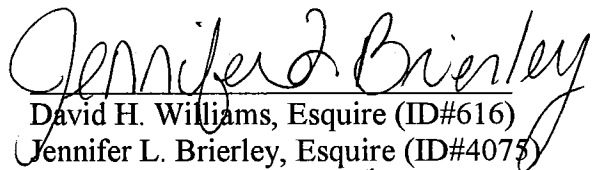
4. Have you ever been sued or been involved in a serious dispute with your employer? If so, explain the circumstances and the outcome.

5. Do you feel that you have been treated unfairly at work or discriminated against in employment? If so, explain.

6. Are you, a relative, or a friend related to, or personally acquainted with David H. Williams, Jennifer L. Brierley, Jeffrey Martin, or Keri Morris (formerly Keri Williams), or have you, a relative, or a friend ever been represented by David H. Williams, Jennifer L. Brierley, Jeffrey Martin, Kerri Morris, the law firm of Morris, James, Hitchens & Williams LLP, or the law firm of Margolis Edelstein?

7. Are you, a relative, or a friend, related to, or personally acquainted with any of the individuals who might appear as witnesses in this case (see attached list)?

**MORRIS, JAMES, HITCHENS
& WILLIAMS LLP**



David H. Williams, Esquire (ID#616)

Jennifer L. Brierley, Esquire (ID#4075)

222 Delaware Avenue, 10th Floor

Wilmington, DE 19801-1621

(302) 888-6800

dwilliams@morrisjames.com

jbrierley@morrisjames.com

Attorneys for Defendant

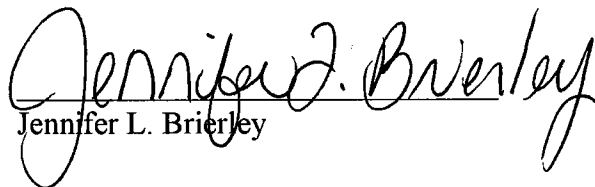
Dated: May 3, 2005

CERTIFICATE OF SERVICE

I, Jennifer L. Brierley, hereby certify that on this 3rd day of May, 2005, I caused to be served a true and correct copy of Defendant's Proposed Voir Dire by electronic delivery and mail to:

Jeffrey K. Martin
Margolis Edelstein
1509 Gilpin Avenue
Wilmington, DE 19806

Attorney for Plaintiff Lynn Sansoucie


Jennifer L. Brierley